

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

Haliron Power, LLC,

Plaintiff,

vs.

Fluor Daniel Caribbean, Inc., a subsidiary of  
Fluor Enterprises, Inc., Zurich American  
Insurance Company, Federal Insurance  
Company, Travelers Casualty and Surety  
Company, Fidelity and Deposit Company of  
Maryland, and Liberty Mutual Insurance  
Company,

Defendants.

Civil Action No.: 6-18-cv-02911-TMC

**NOTICE OF REQUEST FOR PROTECTION**

Pursuant to Local Rule 6.02, N. Ward Lambert, counsel for the Defendants, Fluor Daniel Caribbean, Inc., a subsidiary of Fluor Enterprises, Inc., Zurich American Insurance Company, Federal Insurance Company, Travelers Casualty and Surety Company, Fidelity and Deposit Company of Maryland, and Liberty Mutual Insurance Company, respectfully requests this Honorable Court's protection from being called to hearings or other Court appearances in this case from June 24 – June 28, 2019, as counsel has a family vacation scheduled.

Respectfully submitted,

s/N. Ward Lambert

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*Attorneys for Defendants, Fluor Daniel Caribbean, Inc., a subsidiary of Fluor Enterprises, Inc., Zurich American Insurance Company, Federal Insurance Company, Travelers Casualty and Surety Company, Fidelity and Deposit Company of Maryland, and Liberty Mutual Insurance Company*

April 15, 2019  
Greenville, South Carolina